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15 *Attorneys for Defendant*  
16 *Walmart, Inc.*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 Case No.: 2:17-cv-02196-APG-VCF

19 SYLVIA LEYS,  
20 Plaintiff,

21 v.

22 WAL-MART STORES, INC., dba WALMART  
STORE #4356 a foreign  
23 corporation; DOE EMPLOYEE; DOES I  
24 through XXX, inclusive and ROE  
BUSINESS ENTITIES I through XXX,  
25 inclusive,  
Defendants.

**STIPULATION AND ~~PROPOSED~~**  
**ORDER TO EXTEND DISCOVERY**  
**DEADLINES**

**[THIRD REQUEST]**

26  
27 Plaintiff Sylvia Leys, (hereinafter "Plaintiff") and Defendant WALMART, INC. (hereinafter  
28 "WALMART" or "Defendant"), by and through their respective counsels of record, do hereby

1 stipulate to extend the remaining deadlines in the current scheduling order and discovery plan in this  
2 matter for a period of one hundred twenty (120) days for the reasons explained herein.

3 Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the third such discovery  
4 extension requested in this matter.

5 **DISCOVERY COMPLETED TO DATE**

- 6
- 7 • The parties have conducted an FRCP 26(f) conference and have served their respective FRCP  
8 26(a) disclosures;

9 **DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF**  
10 **DISCOVERY**

11 Discovery to be completed includes:

- 12
- 13 • Plaintiff's and Defendant's additional Written Discovery request(s);
  - 14 • Deposition of Plaintiff (currently scheduled for June 15, 2018);
  - 15 • Deposition of Plaintiff's and Defendant's Experts;
  - 16 • Deposition of Plaintiff's treating physicians;
  - 17 • Deposition of Defendant 30(b)(6) witness;
  - 18 • Defendant is still in the process of subpoenaing Plaintiff's medical records;
  - 19 • Inspection of the subject premises (if necessary).

20 The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested  
21 extension. The parties agree that, pending this Court's approval, extension of remaining discovery  
22 deadlines is appropriate, as Defendant's and Plaintiff's are still in the process of obtaining Plaintiff's  
23 medical records. Further, the parties wish to continue to investigate this case by conducting additional  
24 important depositions, which may advance the potential for pre-trial resolution of this matter without  
25 the need for incurring fees and costs associated with trial preparations.

26 **[PROPOSED] NEW DISCOVERY DEADLINES**

27 **Discovery Cut-Off Date . . . . . November 12, 2018**

28 **Dispositive Motion Deadline . . . . . December 11, 2018**

Joint Pretrial Order due January 10, 2019 If dispositive motions are filed, the deadline  
for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive  
motions or further court order.

1 If this extension is granted, all anticipated additional discovery should be concluded within the  
2 stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is  
3 made by the parties in good faith and not for the purpose of delay.  
4

5 DATED this 14th day of June, 2018.

DATED this 14th day of June, 2018.

6  
7 /s/ Ramzy P. Ladah  
8 Ramzy P. Ladah, Esq.  
9 Nevada Bar No. 11405  
10 LADAH LAW FIRM  
11 517 S. Third Street  
12 Las Vegas, NV 89101  
13 *Attorneys for Plaintiff*

/s/ Tracee Duthie  
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*Attorneys for Defendant*  
*Walmart, Inc.*

14 DATED this 14th day of June, 2018.

15 /s/ Charles Abbott  
16 Charles Abbott (SBN 13811)  
17 **Law Offices of Charles Abbott, PC**  
18 Ronald H. Reynolds (SBN 827)  
19 Harrison J. Reynolds (SBN 13748)  
20 **Reynolds & Associates**  
21 823 Las Vegas Boulevard, S. Suite 280  
22 Las Vegas, Nevada 89101

*Attorneys for Defendant*  
*Walmart, Inc.*

23 **IT IS SO ORDERED:**

24   
25 **UNITED STATES MAGISTRATE JUDGE**

26 DATED: 6-19-2018  
27  
28

**CERTIFICATE OF SERVICE**

Pursuant to FRCP Rule 5, I hereby certify that I am an employee of the law firm PHILLIPS, SPALLAS & ANGSTADT, LLC, and that on this 14th day of June, 2018, I electronically served a copy of **STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY DEADLINES [THIRD REQUEST]** as follows:

- ☐ By facsimile addressed to the following counsel of record, at the address listed below;
- ☐ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☐ By Hand Delivery (ROC); and/or
- ☒ By Electronic Service through CM/ECF to:

ATTORNEY OF RECORD	TELEPHONE/FAX	PARTY
RAMZY P. LADAH ESQ. Nevada Bar No. 11405 <b>LADAH LAW FIRM</b> 517 S. Third Street Las Vegas, NV 89101 <a href="mailto:ramzy@ladahlaw.com">ramzy@ladahlaw.com</a>	Phone 702-252-0055 Fax 702-248-0055	Plaintiff
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An Employee of PHILLIPS, SPALLAS & ANGSTADT LLC